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Attorneys for Defendant LG Electronics U.S.A., Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR., DAVID
ESPINOZA, and CHRISTOPHER MILLS, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

LG ELECTRONICS, INC., LG
ELECTRONICS U.S.A., INC., SAMSUNG
ELECTRONICS CO. LTD., SAMSUNG
ELECTRONICS AMERICA, INC., SONY
CORPORATION, and SONY ELECTRONICS
CORPORATION,

Defendants.

Civil Action No. 17-cv-1775 (MCA) (SCM)

**DECLARATION OF BRIAN M.
WILLEN IN SUPPORT OF
ADMISSION PRO HAC VICE**

Brian M. Willen, of full age, hereby declares as follows:

1. I am a partner with the law firm of Wilson Sonsini Goodrich & Rosati, P.C. with my office at 1301 Avenue of the Americas, 40th Floor, New York, NY 10019-6022.

2. I make this declaration in support of this application to appear and participate *pro hac vice* in this matter on behalf of Defendant LG Electronics U.S.A., Inc. ("LG Electronics").

3. I am counsel to LG Electronics and am familiar with the facts of this action, and have experience in the field of law relevant to this action.

4. I am in good standing in every bar I am admitted. I was admitted to the State Bar of New York in 2003, the District of Columbia Bar in 2004, the Michigan State Bar in 2011, and

admitted to practice before the United States District Court for the Southern District of New York in 2012, United States District Court for the Eastern District of Michigan in 2016, United States District Court for the District of Columbia in 2015, United States Court of Appeals for the Second Circuit in 2013, United States Court of Appeals for the Sixth Circuit in 2015, United States Court of Appeals for the Ninth Circuit in 2011, United States Court of Appeals for the Eleventh Circuit in 2017, United States Court of Appeals for the District of Columbia Circuit in 2016. The names and addresses of the office maintaining the roll of the members of each bar to which I am a member are as follows:

New York State Bar
New York State Unified Court System
Office of Court Administration
Attorney Registration Unit
25 Beaver Street – Room 840
New York, NY 10004

District of Columbia Bar
DC Bar Member Service Center
The District of Columbia Bar
1101 K Street NW, Suite 200
Washington, D.C. 20005

Michigan State Bar
Attorney Admissions
The State Bar of Michigan
306 Townsend Street
Lansing, MI 48933-2012

U.S. District Court for the Southern District of New York
Attorney Admissions
500 Pearl Street
New York, NY 10007

U.S. District Court for the Eastern District of Michigan
Attorneys Admissions
231 West Lafayette Blvd.
Detroit, MI 48226

U.S. District Court for the District of Columbia
Office of the Clerk
333 Constitution Avenue N.W.
Washington, DC 20001

U.S. Court of Appeals for the Second Circuit
Attorney Admissions
40 Foley Square
New York, NY 10007

U.S. Court of Appeals for the Sixth Circuit
Attorney Admissions
100 East Fifth Street
Cincinnati, OH 45202

U.S. Court of Appeals for the Ninth Circuit
Attorney Admission
95 7th Street
San Francisco, CA 94103

U.S. Court of Appeals for the Eleventh Circuit
Attorney Admissions
56 Forsyth Street, N.W.
Atlanta, GA 30303

U.S. Court of Appeals for the District of Columbia Circuit
Attorneys Admissions
333 Constitution Ave., N.W.
Washington, DC 20001

5. No disciplinary proceedings are pending against me in any jurisdiction, and no discipline has previously been imposed upon me in any jurisdiction. Likewise, I have not been subject to suspension or disbarment by any court.

6. If this application to appear *pro hac vice* is granted I agree to:

a. Pay the fee for *pro hac vice* admission to the Clerk of the United States District Court for the District of New Jersey;

b. Pay the annual fee to the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2(a);

c. Abide by the Rules Governing this Court, including but not limited to L.Civ.R. 101.1(c);


d. Consent to the appointment of the Clerk of the United States District Court for the District of New Jersey as agent upon whom service of process may be made for all actions against me that may arise out of my participation in this matter;

e. Notify the Court immediately of any matter affecting my standing in the bar of any other court; and

f. Have all pleadings, briefs, and other papers filed with the Court signed by Jeffrey J. Greenbaum, or another attorney licensed to practice law in the District of New Jersey for Sills Cummis & Gross, P.C., as the attorney of record for LG Electronics.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 7, 2017.



Brian M. Willen